

4	September 1, 2021	\$529.34
5	October 1, 2021	\$529.34
6	November 1, 2021	\$529.34
7	December 1, 2021	\$529.34
8	December 30, 2021	\$560.67
9	February 1, 2022	\$560.67
10	March 1, 2022	\$560.67
11	April 1, 2022	\$560.67

All in violation of Title 18, United States Code, Section 641.

COUNTS 12-25
[Supplemental Security Income Fraud]

On or about each of the dates set forth below, in Oswego County in the Northern District of New York, the defendant, **LISA M. WALDRON**, having made application to receive benefits under Title 42, Chapter 7, Subchapter XVI of the United States Code for the use and benefit of Jordan Brooks and having received such benefit, **LISA M. WALDRON** did knowingly and willfully convert all or part of the following benefit payments to a use other than for the use and benefit of Jordan Brooks:

Count	Date Benefit Paid	Amount of Benefit
12	January 31, 2020	\$522.00
13	April 1, 2020	\$522.00
14	May 1, 2020	\$522.00
15	June 1, 2020	\$522.00
16	July 1, 2020	\$522.00
17	September 1, 2020	\$522.00
18	October 1, 2020	\$522.00
19	October 30, 2020	\$522.00

20	December 1, 2020	\$522.00
21	December 31, 2020	\$529.34
22	February 1, 2021	\$529.34
23	March 1, 2021	\$529.34
24	April 1, 2021	\$529.34
25	April 30, 2021	\$529.34

All in violation of Title 42, United States Code, Section 1383a(a)(4).

FIRST FORFEITURE ALLEGATION

The allegations contained in Counts One through Seven of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 641, the defendant, **LISA M. WALDRON**, shall forfeit to the United States of America any property, real and personal, which constitutes and is derived from proceeds traceable to said violation. The property to be forfeited includes, but is not limited to, the following:

- a. A money judgment in the amount of \$529.34 per count (Counts One through Seven).

SECOND FORFEITURE ALLEGATION

The allegations contained in Counts Eight through Eleven of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 641, the defendant, **LISA M. WALDRON**, shall forfeit to the United States of America any property, real and personal, which constitutes and is derived from proceeds traceable to said violation. The property to be forfeited includes, but is not limited to, the following:

- a. A money judgment in the amount of \$560.67 per count (Counts Eight through Eleven).

SUBSTITUTE ASSET PROVISION

If any of the property described above, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 641 and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Dated: 12/8/22

A TRUE BILL,


Grand Jury Foreperson

CARLA B. FREEDMAN
United States Attorney

By: Adrian S. LaRochelle
Adrian S. LaRochelle
Assistant United States Attorney
Bar Roll No. 701266